

MULLIN HOARD & BROWN, L.L.P.

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*Counsel for Hines Farms, LLC and Hines Cattle Company, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

IN RE:  McCLAIN FEED YARD, INC., McCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC.,  Debtors. <sup>1</sup>	Chapter 7  CASE NO. 23-20084-rlj  Jointly Administered
RABO AGRIFINANCE LLC,  <i>Plaintiff,</i>  v.  ACEY LIVESTOCK, LLC, et al.  <i>Defendants.</i>	<b>ADV. PROC. NO. 23-02005-rlj</b>  <b>Honorable Robert L. Jones</b>

**DEFENDANTS HINES FARMS, LLC AND HINES CATTLE COMPANY, LLC'S  
ORIGINAL ANSWER TO PLAINTIFF RABO AGRIFINANCE LLC'S COMPLAINT  
FOR DECLARATORY RELIEF**

TO THE HONORABLE ROBERT L. JONES, U.S. Bankruptcy Judge:

Defendants Hines Farms, LLC and Hines Cattle Company, LLC (collectively, the “Defendants”) hereby file their answer to the Complaint filed by Plaintiff, Rabo Agrifinance LLC (“RAF”), and state:

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<sup>1</sup> The Debtors in these jointly administered cases are: (1) McClain Feed Yard, Inc. (Case No. 23-20084); (2) McClain Farms, Inc. (Case No. 23-20885); and (3) 7M Cattle Feeders, Inc. (Case No. 23-20886). All three cases are being jointly administered under the case number for McClain Feed Yard, Inc.

**JURISDICTION, VENUE, AND PARTIES**

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted.

7. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

8. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

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56. Admitted.

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137. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

138. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

139. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

140. No admission or denial is required as to this paragraph.

### **GENERAL ALLEGATIONS**

141. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

142. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

143. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

144. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

145. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

146. Defendants admit that McClain engaged in a multi-million dollar Ponzi and check kiting scheme, but otherwise deny the allegations in this paragraph.

147. Admitted.

148. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

149. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

150. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

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155. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

156. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

157. Admitted.

158. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

159. Admitted.

160. Admitted.

161. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

162. Denied.

163. Denied.

164. Defendants admit the allegations as to itself, but otherwise Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

165. No admission or denial is required as to this paragraph.

166. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

167. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

168. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

169. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

170. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

171. Denied.

172. Denied.

173. Denied.



**FIRST CAUSE OF ACTION  
(Declaratory Judgment)**

174. Defendants incorporate and reallege their responses to each of the paragraphs above, as if fully set forth herein.

175. Admitted.

176. Admitted.

177. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

178. Admitted.

179. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

180. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

181. Denied.

182. Denied.

183. Denied.

184. Denied.

185. Defendants incorporate and reallege their responses to each of the paragraphs above, as if fully set forth herein.

186. Admitted.

187. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

188. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

189. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

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192. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

193. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

194. Denied.

195. Denied.

196. Admitted.

197. Denied.

198. Denied.

199. Denied.

200. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

201. Denied.

202. Denied.

**THIRD CAUSE OF ACTION  
(Declaratory Judgment)**

203. Defendants incorporate and reallege their responses to each of the paragraphs above, as if fully set forth herein.

204. Admitted.

205. Admitted.

206. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

207. Defendants admit that the quoted statute says what it says. Otherwise, the allegations in this paragraph are denied.

208. Defendants admit that the quoted statute says what it says. Otherwise, the allegations in this paragraph are denied.

209. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

210. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

211. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

212. Denied.

### **PRAYER FOR RELIEF**

Defendants deny that RAF is entitled to the relief it seeks in this Complaint for Declaratory Relief and pray that RAF take nothing by this lawsuit. Defendants further pray that they be awarded their costs and reasonable attorneys' fees incurred herein.

DATED February 22, 2024.

Respectfully Submitted,

MULLIN HOARD & BROWN, L.L.P.

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/s/ Steven L. Hoard

Steven L. Hoard, SBN: 09736600

***Counsel for Hines Farms, LLC and Hines Cattle Company, LLC***

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Answer was served on all parties who have entered an appearance in this adversary proceeding via ECF on February 22, 2024.

/s/Steven L. Hoard

Steven L. Hoard